

Submission  
No 218

**INQUIRY INTO ANIMAL WELFARE POLICY IN NEW  
SOUTH WALES**

**Name:** Name suppressed

**Date Received:** 28 February 2022

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Partially  
Confidential

As professional hard working citizens and registered breeders and Members of DogsNSW for over 30 years, we offer the following submission for your consideration in relation to the ***Draft Animal Welfare Bill 2022***. The welfare of not only our dogs, but all animals is our greatest priority.

## **Part 2: Interpretation**

- There is no clarity given as to if or how exhibiting a dog at a conformation dog show falls in the wording of section 10.

## **Part 3: Requirements for care of animals**

### **Division 3: Prohibited and restricted procedures**

#### **Section 22: Prohibited procedures**

- Section 22(1)(e) prohibits a person from carrying out a surgical artificial insemination of a dog.
- What is a '*person*' in the context of the above as the average person cannot perform the above procedure.
- There are three types of artificial insemination, namely standard artificial insemination, TCI (transcervical Insemination) and surgical implant. TCI and surgical implant procedures are only performed by reproductive specialist Veterinarians. Frozen semen cannot be used for a standard artificial insemination and the success rates are higher using the surgical implant procedure which is also less stress on the dogs in comparison to a TCI.
- No reasonable explanation has been given as to why this procedure should be prohibited.
- Being a rabies free island country with strict quarantine and importation rules, importing frozen semen gives breeders access to important genetic material that would otherwise not be possible. To prohibit Veterinarians from doing this procedure would adversely affect responsible breeders efforts to maintain the health, quality and genetic variance of their chosen breed.

## **Part 7: Enforcement and compliance**

### **Section 66: Powers of authorised officers to enter non-residential premises**

- There is no definition for '*commercial*' included in the draft bill.
- 66(1)(f) The use of the word '*commercial*' infers 'making a profit'. It is unreasonable to assume all registered breeders make financial gain. In light of this, how can someone be deemed '*commercial*' if they are running at a constant loss?

Thank you for the opportunity to offer our feedback. If you require any further contact please do not hesitate to contact us.

Respectfully yours,